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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138
Carson City, Nevada 89706-0851

August 18, 2004

Mr. Randall L. Jackson
Health, Safety & Environmental Director
DCI Management Group Ltd.
4510 W. 63rd
Terrace Prairie Village, KS 66208

Subject: **Work Plan
Proposed Subsurface Investigation**

Facility: Former Al Phillips the Cleaners Site
Maryland Square Shopping Center
Las Vegas, NV

Facility ID#: **H-000086**

Dear Mr. Jackson:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed the Work Plan, dated June 4, 2004 and received June 28, 2004, prepared by your consultant, URS Corporations, for the above-referenced facility.

The NDEP has the following comments on the Work Plan:

1. Please correct the following grammatical/spelling errors in the Work Plan:
 - a. Section 1; INTRODUCTION; Page 1 - Please insert "at" between "...tetrachloroethylene (PCE)" and "the former Al Phillips..." in the third line of this paragraph.
 - b. Section 1.1; SITE LOCATION; Page 1 - Please change "Chopping" to "Shopping" in the first line of this paragraph.
 - c. Section 1.4; TOPOGRAPHY, GEOLOGY, AND HYDROGEOLOGY; Page 2 - Please insert "or" between "The site is located on" and "near the center..." in the first line of the second paragraph.

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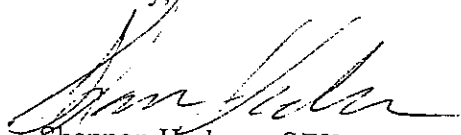
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- d. Section 3.4; GROUNDWATER MONITOR WELL INSTALLATION; Page 7; Second Paragraph – Please change “tap” to “tape” in the ninth sentence of this paragraph.
 - e. Section 3.5; WELL DEVELOPMENT; Page 7 – In the eighth sentence of this paragraph, please change “us” to “use.”
 - f. Section 3.6; GROUNDWATER SAMPLING; Page 8; Paragraph 4 – Please insert “will be” between “Monitoring wells” and “sampled using a clean...” in the first sentence of this paragraph.
 - g. Section 5; QUALITY CONTROL; Page 13; First Paragraph – In the fourth sentence of this paragraph, please insert “is” between “...duplicate samples” and “not revealed to the ...”
2. A discrepancy exists between the last sentence of Section 1.4; TOPOGRAPHY, GEOLOGY, AND HYDROGEOLOGY; Page 2 and the last sentence of Section 2.2; BOREHOLE LOCATIONS AND DEPTHS. The sentence of Section 1.4 states that, “the depth to groundwater near the subject site is approximately 16-feet below ground surface on the west...” and the sentence of Section 2.2 states that the boreholes to be drilled inside and behind the Al Phillips facility (located at the west side of the site) “will be drilled to a depth of approximately 17 to 22 feet to avoid intercepting groundwater.” If the groundwater at the west end of the site is 16-feet below ground surface, 17 to 22-foot deep boreholes in this area will intercept the groundwater. Please correct this discrepancy.
3. Section 2.3; GROUNDWATER MONITORING WELLS AND DEPTHS; Page 3; Second Paragraph and Section 3.4; GROUNDWATER MONITOR WELL INSTALLATION; Page 6; First Paragraph – In addition to the proposed monitoring wells, additional monitoring wells should be installed to the north of MW-18 along Algonquin Drive in order to detect any groundwater containing contaminants of concern flowing in a north-northeast direction. Additionally, MW-23 should be installed and sampled regardless of the analytical results of MW-22, as MW-22 is cross-gradient of MW-23. The installation of MW-24 and MW-25 can be based on the analytical results of MW-23 and MW-24, respectively, not MW-22. Also, should contaminants of concern be present in MW-18 and/or MW-22, additional monitoring wells should be installed in Seneca Lane and/or Cherokee Lane, depending on the specific results.
4. Section 2.3; GROUNDWATER MONITORING WELLS AND DEPTHS; Page 4 – What is the decision criteria for if, and where, MW-24 and MW-25 will be installed along Algonquin Drive? As stated above in Comment No. 3, additional monitoring wells should be installed to the north of MW-18 along Algonquin Drive regardless of the analytical data from MW-22 or MW-23.

5. Section 2.8; GROUNDWATER ANALYSIS; Page 4 – MW-22 and MW-23, along with the most downgradient monitoring wells in a north-south direction (i.e., those installed along Algonquin Drive, or subsequently along Seneca Drive and/or Cherokee Lane and/or MW-24 or MW-25, based on the analytical results from MW-24) should be sampled for total iron and manganese, chloride, nitrate and sulfate, alkalinity, and total organic carbon as corrective action will be required at the most downgradient edge of the contaminant plume.
6. Section 3.4; GROUNDWATER MONITOR WELL INSTALLATION; Page 7; First Paragraph – Why is the installation of MW-17 and MW-18 dependent on the results of MW-22 as these two proposed wells would be located in an upgradient direction from MW-22?
7. Figure 2; SITE PLAN SHOWING EXISTING AND PROPOSED BOREHOLE LOCATIONS:
 - a. Why are Borings B-1 and B-3 being placed in such close proximity to earlier borings?
 - b. Why are Borings B-11 and B-12 being placed in an upgradient location from the Former Al Phillips facility?
 - c. Why are there no borings being installed downgradient of the Former Al Phillips facility?

The NDEP requests that the above-listed comments be addressed in a Response to Comments submitted to the undersigned by September 10, 2004. In addition, please contact the undersigned at 702-486-8267 or sharbour@ndep.nv.gov with any questions or comments about this letter.

Sincerely,



Shannon Harbour, SEII
Remediation and LUST Branch
Bureau of Corrective Actions
NDEP-Las Vegas Office

SMH:cda

cc: Todd Croft, Supervisor, Bureau of Corrective Actions, NDEP Las Vegas, NV
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